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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA
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14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 vs.
17 ROCCO LAZZARO,
18 Defendant.

2:12-cr-00485-GMN-PAL
STIPULATION TO CONTINUE
MOTION HEARING
(First Request)
(Emergency Consideration Requested)

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United
19 States Attorney, and Christina M. Brown, Assistant United States Attorney, counsel for the United
20 States of America, and Rene L. Valladares, Federal Public Defender, and Shari L. Kaufman,
21 Assistant Federal Public Defender, counsel for defendant ROCCO LAZZARO, that the Motion
hearing currently scheduled for March 25, 2013, at the hour of 10:00 a.m., be vacated and set to any
22 day next week; however, in no event earlier than Tuesday, March 26, 2013.
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24 This Stipulation is entered into for the following reasons:
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26 1. Defense counsel will be out of the office on an office mandated furlough day
during the presently scheduled hearing date and time.
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28 2. Additionally, defense counsel is the attorney who has specific knowledge
of the case and respectfully requests a resetting of the motion hearing in this matter.
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1 3. The defendant Lazazzaro is incarcerated does not object to the continuance.

2 4. The parties agree to the continuance.

3 5. The additional time requested herein is not sought for purposes of delay, but
4 merely to allow for a resetting in this matter.

5 6. Additionally, denial of this request for continuance could result in a
6 miscarriage of justice.

7 7. The additional time requested by this Stipulation is excludable in computing
8 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
9 United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States
10 Code, Sections 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

11 This is the first request to continue the motion hearing date filed herein.

12 DATED this 21st day of March, 2013.

13 RENE L. VALLADARES
14 Federal Public Defender

DANIEL BOGDEN
United States of America

15 */s/ Shari L. Kaufman*
16 By: _____
17 SHARI L. KAUFMAN
18 Assistant Federal Public Defender
19 Counsel for Rocco Lazazzaro

15 */s/ Christina M. Brown*
16 By: _____
17 CHRISTINA M. BROWN
18 Assistant United States Attorney
19 Counsel for the Plaintiff

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 ROCCO LAZZARO,

7 Defendant.

2:12-cr-00485-GMN-PAL

ORDER

9 Based on the pending Stipulation of counsel, and good cause appearing therefore,

10 IT IS THEREFORE ORDERED that the motion hearing currently scheduled for Monday,

11 March 25, 2013, at the hour of 10:00 a.m., be vacated and continued to Thursday, 3/28/2013

12 at the hour of 9:00am

13 DATED March 25, 2013.

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15 UNITED STATES MAGISTRATE JUDGE

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